#### Submission Date Between 04/08/2010 and 04/29/2010

**Key Topic: Fat** 

Comment ID: 000946

Submission Date: 04/19/2010

Organization Type: Industry Association
Organization Name: Martek Biosciences

First Name: Edward Last Name: Nelson

Job Title: Medical Director

Key Topic: Fats

**Sub Topic:** Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Please see the attached zip file containing 2 documents

**Comment ID:** 000948

Submission Date: 04/20/2010

Organization Type: Industry Association
Organization Name: Martek Bioscience

**First Name:** Edward B. **Last Name:** Nelson

Job Title: Medical Director

Key Topic: Fats

**Sub Topic:** Fish oil, Omega 3 fatty acids

Attachment: Y

**Comment:** Please see the attached letter.

4/30/10 10:30 AM Page 1 of 4

#### Submission Date Between 04/08/2010 and 04/29/2010

**Key Topic: Fat** 

**Comment ID:** 000928

Submission Date: 04/13/2010

**Organization Type:** Nonprofit/Voluntary

Organization Name:
First Name: Adriana
Last Name: Gutierrez

Job Title: Concerned Citizen and Lay Health Educator

Key Topic: Carbohydrates, Energy Balance/Physical Activity, Fats, Food Groups, Protein

Sub Topic: Added sugars, Cholesterol, Fiber, Grains, Whole grains, Low carbohydrate, Weight loss, Weight maintenance

Attachment: N

**Comment:** There are two main problems with the current Dietary Guidelines:

- 1. They do not work. Despite a documented shift in eating habits in the US population toward eating less fat, more chicken and fish, less red meat and low fat dairy products, we have epidemics of obesity and diabetes in adults and children. The current dietary recommendations are so high in carbohydrates that the population is required to be a slave to a treadmill to overcome the fat that the body puts on when carbohydrates are metabolized and stored in the body. It is not practical for the majority of our population to maintain the necessary level of exercise to compensate for the high carbohydrate intake. Revised guidelines must recommend significantly lower levels of carbohydrates and higher levels of protein and dietary fat to reverse the drastic negative health effects of the past 20 years of misguided "guidelines." I recommend two levels of guidelines:
- Maintenance Guidelines for people with healthy weight and healthy health indicators cholesterol and triglycerides
- Corrective Guidelines for people who need to lose weight or improve their health markers. With 70% of the population overweight or obese we cannot overlook the critical nature of giving sound guidance based on research.
- 2. As a lay health educator I can attest firsthand to the difficulty of using the current pyramid with it's "pie slice" format, as a teaching tool. It does not communicate intuitively recommended volumes of the different food groups or the relative importance. I find the "dinner plate" format much more effective as a communication tool. If you must stick with the pyramid the horizontal slices are much easier to use as a teaching tool.

4/30/10 10:30 AM Page 2 of 4

#### Submission Date Between 04/08/2010 and 04/29/2010

**Key Topic: Fat** 

**Comment ID:** 000955

Submission Date: 04/27/2010

Organization Type: Other

Organization Name: Martek Biosciences Corporation

First Name: Rodney
Last Name: Gray

Job Title: Vice President, Regulatory Affairs

**Key Topic:** Fats

**Sub Topic:** Fish oil, Omega 3 fatty acids

Attachment: Y

Comment: Background on global trends in fish production, intake and composition from the recently released interim conclusions of an FAO/WHO expert consultation on total fat and fatty

acid requirements are discussed. Opportunities and limitations associated with dietary guidance based solely on fish consumption are outlined for consideration by the DGAC.

Comment ID: 000941

Submission Date: 04/15/2010
Organization Type: Other

Organization Name: Kraft Foods

First Name: Carol Last Name: Kellar

Job Title: Sr. Director, Quality, Scientific & Regulatory Affairs

Key Topic: Fats, Fluid and Electrolytes, Food Groups, Vitamins

Sub Topic: Fish oil, Omega 3 fatty acids, Folate, Grains, Whole grains, Saturated fatty acids, Sodium, Vitamin D, Vitamin E

Attachment: Y

**Comment:** See attached document with references.

4/30/10 10:30 AM Page 3 of 4

#### Submission Date Between 04/08/2010 and 04/29/2010

**Key Topic: Fat** 

Comment ID: 000959

Submission Date: 04/29/2010

**Organization Type:** Professional Association

Organization Name: Healthy Mothers Healthy Babies Perinatal Nutrition Research Group

First Name: Mary

Last Name: Harris

Job Title: Professor

Key Topic: Fats

**Sub Topic:** Fish oil, Omega 3 fatty acids

Attachment: Y

Comment:

Consumers and healthcare providers are confused about eating seafood. The following conclusion aims to address that uncertainty by summing up science that shows eating fish is safe.? Consistent evidence shows that the health benefits derived from the consumption of a variety of cooked seafood in the U.S. in amounts recommended by the Committee outweigh the risks associated with methyl mercury (MeHg) and persistent organic pollutants (POPs) exposure, even among vulnerable populations.? It is particularly important the draft conclusion statement for pregnant and breastfeeding women remain clear in this regard. We commend the USDA for its overall positive approach to the benefits of seafood consumption but are concerned about the wording of the statement regarding seafood safety without a positive statement regarding the benefits. ?Overall, consumers can safely eat up to 12 ounces of a variety of cooked seafood per week provided they pay attention to local seafood advisories and limit their intake of large, predatory fish.? To alleviate any misinterpretation of this conclusion, we suggest the following statements which are consistent with the U.S. Food and Drug Administration?s ?Draft Risk and Benefit Assessment Report of Quantitative Risk and Benefit Assessment of Consumption of Commercial Fish,? and the 2006 IOM ?Seafood Choices?: Consistent evidence shows the overall effect of eating a variety of cooked seafood in the U.S. in amounts recommended by the Committee is a health benefit. Methyl mercury (MeHg) and persistent organic pollutants (POPs) exposure does not pose a measurable health risk, even among vulnerable populations.? And to clarify that there is not a science-based risk linked to eating more than 12 ounces of a variety of cooked seafood per week with a statement to the effect of, ?Overall, consumers can safely eat cooked seafood regularly, provided they eat a variety and follow local advice for recreationally-caught fish.?

4/30/10 10:30 AM Page 4 of 4